

**IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF  
FLORIDA- MIAMI DIVISION  
CASE NO. 1:24-CV-24617-ALTONAGA**

---

THE HAITIAN DIASPORA POLITICAL  
ACTION COMMITTEE (HDPAC)  
PROJECT2MORROW  
NATHANIEL BALLANTYNE  
CRIDIKEL TRUTHBAY  
RENEE HASLER  
DARLENE P. LICIN  
JOCELYN JEAN LOUIS KICWITT  
CINEUS ALIX PIERRE  
FRANTZ SAINT FORT  
ANGE CARMEL  
MARIE FONTILUS  
ERIC PLACIDE  
(On behalf of themselves and all other similarly  
situated donors and beneficiaries)

Plaintiffs,

vs.

THE AMERICAN RED CROSS  
GAIL J. MCGOVERN, (in her  
Official Capacity as Chief Executive  
Officer (CEO) of the American Red Cross,  
CLIFF HOLTZ, (in his capacity as president  
and Chief Executive Officer of American Red Cross)  
BONNIE MCELVEEN-HUNTER  
(Individually and her official capacity as chairwoman  
of the Board of directors of the American Red Cross)  
THE BOARD OF DIRECTORS  
OF THE AMERICAN RED CROSS  
(In their individual And official capacities.)

Defendants.

---

**PLAINTIFFS' CORPORATE DISCLOSURE AND  
CERTIFICATE OF INTERESTED PARTIES**

Pursuant to this Court's Order Requiring Scheduling Report and Certificates of Interested  
Parties [DE 32] and Rule 7.1 of the Federal Rules of Civil Procedure, Plaintiffs certify as follows:

1. Plaintiffs, the Haitian Diaspora Political Action Committee, the Haitian Diaspora Federation and Project2Morrow do not have parent corporations, nor do they have any publicly traded company that owns 10% or more of their stock.
2. Other than the named parties in the above-style action, there may be other Haitian Diaspora organizations whose members donated money to Defendants for the specific purpose of helping victims of natural disasters in Haiti between 2010 and 2024 and those organizations may have a financial interest in the outcome of the case.
3. The Haitian Government may as well have an interest as the legal representative of the victims on whose behalf the Defendants collected half a billion dollars.
4. Other than that, Plaintiffs are not aware of any persons, associated persons, firms, partnerships, or corporations that have a financial interest in the outcome of this case, including subsidiaries, conglomerates, affiliates, parent corporations, and other identifiable legal entities related to a party.

Respectfully submitted,

**MORRIS LEGAL, LLC**  
2800 Biscayne Boulevard –  
Suite 530  
Miami, Florida 33137  
Telephone: 305-444-3437  
Facsimile: 305-444-3457  
/s/ Jolyon Wilson Morris

FBN# 069493  
*Counsel for Plaintiffs*

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 17, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Jolyon Wilson Morris